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7 Attorney for Ferdinand Richard Balcar, Jr.

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FERDINAND RICHARD BALCAR, JR.,

15 Defendant.

Case No. 2:96-cr-00046-KJD-PAL

**Stipulation to Continue Supplement's  
Deadline to Motion for  
Compassionate Release**  
(Third Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Freirson, United  
18 States Attorney, and Elizabeth White, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Heidi Ojeda, Assistant  
20 Federal Public Defender, counsel for Ferdinand Richard Balcar, Jr., request that the due date  
21 for Mr. Balcar's Supplement to Motion for Compassionate Release (ECF No. 249), be extended  
22 until January 31, 2023.

23 This Stipulation is entered into for the following reasons:

- 24 1. The Court previously granted the parties request for a stipulation to continue  
25 the supplement date. Unfortunately, due to a calendar error, counsel did not file  
26

1 by that date. Defendant's family recently reached out about the status of his  
2 case. Counsel then realized her mistake and contacted the government.

3 2. Counsel is in trial starting December 5, 2022 and is taking leave around the  
4 holidays. Counsel therefore requests this Court allow defense until January 31,  
5 2023 to file a supplement.

6 3. The parties agree to the continuance.

7 4. Mr. Balcar does not object to the continuance.

8 5. The additional time requested by the stipulation is made in good faith and not  
9 for purposes of delay.

10 This is the third request for a continuance of the supplement deadline.

11 DATED this 30th of November, 2022.

12  
13 RENE L. VALLADARES  
14 Federal Public Defender

JASON M. FRIERSON  
United States Attorney

15 By /s/ Heidi Ojeda  
16 HEIDI OJEDA  
17 Assistant Federal Public Defender

By /s/ Elizabeth White  
ELIZABETH WHITE  
Assistant United States Attorney

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